

1044b UIC - EAST POPLAR OIL FIELD
ENFORCEMENT CASE SDWA 1431
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107-15 CIVIL LAW DEPOSITION
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East Poplar Oil Field
et al.

DEPOSITION - IRMA RE

Region 8



13610

COPY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

CARY G. YOUPEE, et al.,

Plaintiffs,

vs.

MURPHY OIL USA, INC., et al.,

Defendants.

Cause No. CV 98-108-BLG-JDS

Judge Jack D. Shanstrom

MESA PETROLEUM and PIONEER
NATURAL RESOURCES, USA, INC.,

Defendants/
Third Party Plaintiffs &
Cross Plaintiffs,

vs.

AMARCO RESOURCES CORP.
BESTWAY INC.; WESTDALE
PETROLEUM INC.; and THE
PRUDENTIAL GROUP,

Third Party Defendants,

vs.

JOHN DOES 4-50,

Cross-Defendants.

DEPOSITION

OF

IRMA REDDOOR

TIME: Tuesday, June 12, 2001 at 1:12 p.m.

PLACE: Sherman Motor Inn, 200 East Main, Wolf Point, MT

Joann D. Hesser
Official Court Reporter
Fifteenth Judicial District
Roosevelt County Courthouse
Wolf Point, Montana 59201
Ph. (406) 653-6272
Home: (406) 525-3712

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ALSO PRESENT:

Abigail Reddoor

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1 BE IT REMEMBERED: That the oral deposition of IRMA
2 REDDOOR was taken at 1:12 p.m. on the 12th day of June,
3 2001 at the Sherman Motor Inn, 200 East Main, Wolf Point,
4 Montana, with the appearances of counsel hereinbefore
5 noted, before Joann D. Heser, Official Court Reporter and
6 Notary Public for the State of Montana.

7 The following proceedings were had:
8 -----

9 Whereupon,

10 IRMA REDDOOR,

11 called for examination, and being first duly sworn upon her
12 oath, testified as follows:

13 EXAMINATION BY MR. STERUP:

14 Q Please state your name for the record.

15 A Irma Florence Reddoor.

16 Q Irma, where do you reside at the present time?

17 A In Poplar.

18 Q At what location?

19 A [REDACTED] 2 [REDACTED], [REDACTED] t [REDACTED].

20 Q How long have you lived in the Poplar area?

21 A Since 1997.

22 Q Where were you born?

23 A Poplar.

24 Q What year?

25 A 1935.

26 Q Have you ever lived outside of the Poplar area for
27 any significant periods of time?
28

1 A Outside of the state, yes. I was in the U.S.
2 Navy; and for a time, I was in the east coast. And then I
3 got married. My husband was in the Marines. We lived in
4 Virginia and North Carolina and Hawaii and California. And
5 I lived in California for 13 years. And I came back to
6 Montana. Then I went to Albuquerque, and then from there
7 I went to California for two years, and then I came home.

8 Q It sounds like after growing up in the Poplar
9 area, you then lived in other places for quite a number of
10 years before then coming back to Poplar?

11 A Yes.

12 Q When did you come back to Poplar?

13 A 1980 or '81. Anyway, it was when the volcano
14 erupted here -----

15 Q Mount St. Helens.

16 A Mount Helens.

17 Q Okay. And why did you move back to the Poplar
18 area in either 1980 or 1981?

19 A I was divorced, and I was -- I divorced and I was
20 re-married and I just wanted to come home.

21 Q Now, the property that we're primarily interested
22 in for today's purposes has been identified as a six acre
23 tract surrounding the well denoted M27.

24 A Yes.

25 Q You were here for your sister Abigail's
26 deposition.. About how far is your property, the M27
27 property, from your sister's property?
28

1 A Well, I guess about a quarter of a mile. I would
2 guess that because I used to cut across and walk over there
3 sometime.

4 Q And so you and your sister's houses were separated
5 by about a quarter of a mile?

6 A About that.

7 Q And how far was the well M27 from the house, your
8 house, if you know?

9 A Um, my well you're talking about, right?

10 Q Yes.

11 A It was just a few feet. Well, maybe it was two
12 feet.

13 Q Just right there next to the house?

14 A Yeah, um-hm -- west.

15 Q You came back to the Poplar area in the early
16 1980's. The house that you moved into, had that been there
17 for some time?

18 A Well, when I came back, I didn't have a house. I
19 worked at Hope Ranch. And then I bought a trailer house,
20 and this trailer house is what I had moved out there.

21 Q So for a time you lived in the town of Poplar?

22 A Yes.

23 Q And then later you bought a mobile home, a trailer
24 house, and moved it out to the country property?

25 A Yes.

26 Q And how did you come to acquire the six acres that
27 you placed the mobile home on? Was that an inheritance?
28

1 A Yes. It was my grandmother Blanche Reddoor.

2 Q At the time you moved into the mobile home on the
3 property, who was living with you?

4 A My husband and I.

5 Q What was his name?

6 A Thomas Frazier.

7 Q How long did he continue to live at that property?

8 A Oh, 1987, I think -- as far as I can remember.

9 Q And what happened at that time?

10 A We separated and later divorced.

11 Q How long did you continue to live at that
12 property?

13 A 1990.

14 Q So you moved to the property in about 1981, having
15 moved a mobile home out there, and then you stayed on the
16 property until sometime in 1990 when you moved off and
17 lived elsewhere? Is that accurate?

18 A No, because I was out at the Hope Ranch for a
19 time. I would say nineteen -- just prior to 1983 or maybe
20 it was in '93 that I moved that mobile home out there.

21 Q So maybe that was around 1983?

22 A Um-hm. It might have been. It could have been
23 '82. I'm just not really sure.

24 Q And where did you then move in 1990?

25 A Albuquerque.

26 Q Why did you move to Albuquerque in 1990?

27 A Well, um, my sister was going to go down there,
28

1 and I was having a lot of health problems; and I had a
2 friend that was living down there, and she was telling me
3 I should check into their diabetic program down there
4 because it was very -- it was very good. And I thought,
5 well, my family was all -- you know, they were married, had
6 their own families, so I agreed to go down. I was just
7 going to go down for maybe six months or a year, but I
8 stayed down there for five years.

9 Q Where did you live when you were in Albuquerque?

10 A Um, it was an apartment close to where she worked.

11 Q Close to where Abigail worked?

12 A Yeah. It was called Plantation Manor.

13 Q Did you and Abigail live together at that time? or
14 did you have your separate apartments?

15 A No, I had to live close to where she was and have
16 her help because I was already in this wheelchair.

17 Q You mentioned that you went to Albuquerque in part
18 because of health problems and treatment for diabetes?

19 A Yes. Um-hm.

20 Q Had you treated with a doctor for diabetes while
21 you were still living in the Poplar area?

22 A Yes. And another place, too. I have had diabetes
23 about 35 years.

24 Q Who did you treat with in the Poplar area for your
25 diabetes?

26 A Indian Health Service.

27 Q Any particular physician?
28

1 A No. Anyone that came in, I guess.

2 Q During the period when you lived out at the mobile
3 home prior to 1990, did the Indian Health doctors prescribe
4 any particular medication or course of treatment for your
5 diabetes?

6 A Well, when I first went back there, they put me on
7 insulin and then I had to go through a time of adjustment
8 for that. But before that, I was on medi -- you know,
9 pills. So it was a time to go through that; but, ah, I had
10 a lot of medications from -- for infections and things like
11 that, you know, from the doctors.

12 Q What do you mean, infections?

13 A Ah, like I had a toe infection, and they told me
14 to soak my feet three times a day in a bath of, oh,
15 betadine and water; and I did that, and the infection got
16 worse. And it was so accelerated that they sent me right
17 away to Williston and had it amputated. It just seemed to
18 get worse and worse, you know; and they said, are you sure
19 you're soaking your feet three times? I was! And it just
20 didn't help. It just got worse. And then they had to
21 remove that toe.

22 Q About when did they remove the toe?

23 A I would say -- well, when they told me at the
24 hospital, they sent me that week. And, so, it -- whatever
25 it -- I can't remember the exact date of when it was, but
26 I -- they didn't wait too long. You know, they -- it was
27 like a day or two after.
28

1 Q About what year do you think it was that you had
2 the toe amputation?

3 A 1985, 19 -- yeah, I would say about 1985.

4 Q How long before that had you sustained the initial
5 injury to the toe? the original infection? days, weeks,
6 months, years?

7 A It wasn't really an injury, it was -- I was
8 walking; and right underneath the big toe, there's a little
9 line just like under your finger here, and that popped
10 open. I used to take showers every day, and my skin was
11 getting very dry; and I would put lots of lotion on and
12 everything. But just from standing -- you know, walking on
13 it, it popped open. And that's what got infected. I guess
14 I just thought water was going to help me, you know; and I
15 just kept on soaking it and taking showers and it just --
16 it dried out and it got infected. The skin just lifted off
17 of there.

18 Q You said you treated with a physician who
19 recommended that you soak the toe. Who was that physician?

20 A I can't remember who it was. They come and they
21 go so fast. It could have been, ah, Dr. Bunt or, ah --
22 anyway, in the 1980's, it was a long time ago; and like I
23 said, they come and they go and I don't always get the same
24 physician.

25 Q That doctor was at the Indian Health Service in
26 Poplar?

27 A Yes.
28

1 Q So the records at that location, if they still
2 exist, would reflect that you treated with him for the toe
3 problems, I take it?

4 A Yeah, but it wouldn't have been him all the time.
5 Like I said, they don't give me -----

6 Q Or with someone?

7 A Yeah.

8 Q And then you indicated that you soaked it in water
9 with what was it?

10 A Betadine.

11 Q And that's a prescription you got from one of the
12 local pharmacies, I take it.

13 A Yeah. Well, from there, they gave me the bottle
14 of betadine you squirt in with the water, you know, and you
15 soak your foot in it.

16 Q And how long were you observing that procedure
17 before you were told you had to have the toe amputated, was
18 it days, weeks, months?

19 A Maybe it was a week.

20 Q Maybe a week?

21 A Um-hm. (Indicates yes.)

22 Q Did the water that you used to soak it with, where
23 did you get that water?

24 A The tap.

25 Q From your residence, the trailer home?

26 A Yeah, um-hm.

27 Q Did anyone ever suggest to you that the reason the
28

1 toe was infected and had to be amputated had something to
2 do with the quality of the water?

3 A They didn't say. They didn't come right out and
4 say it, 'cause they didn't want it to be quoted.

5 Q So there's no physician that, at that time,
6 suggested there was any connection between your toe
7 problems and the water quality. They didn't come out and
8 say that?

9 A No, they didn't come right out and say it.

10 Q I wanted to continue to track through where you
11 lived and when, before we come back to some of these other
12 issues. You indicated that you moved to Albuquerque in
13 1990 and stayed until sometime in 1995, is that accurate?

14 A Um-hm. Um-hm. (Indicates yes.)

15 Q And at that point where did you move to?

16 A California.

17 Q Where did you live in California?

18 A The house where I raised my children, and it was
19 in Santa Ana.

20 Q Did you still have children or other relatives in
21 that area?

22 A In that area, yes.

23 Q And what was the reason for moving from
24 Albuquerque to Santa Ana?

25 A Um, my son was, um, having problems. He had come
26 out of the Air Force. Well, what the big problem was was,
27 ah, bankruptcy; and his wife left him, and he had four
28

1 children. So I and my daughter decided we was going to go
2 over there and help him take care of those children, so he
3 can get a job and get back on his feet. So we went down
4 there from Albuquerque.

5 Q How long did you then continue to live in Santa
6 Ana?

7 A Two years.

8 Q And where did you move at that time?

9 A Back here to Poplar.

10 Q That was in 1997?

11 A Yes.

12 Q Do you recall what month of the year?

13 A July 4th.

14 Q Where in Poplar did you live at that time?

15 A I just brought in -- I was -- I didn't really --
16 there was those apartments I'm living in now. There was
17 one apartment that my son wanted to get into, so I helped
18 him. I stayed with him for a month or two. And then this
19 other apartment came open; and so my daughter and her
20 family moved in there, and I moved in there with her. And
21 we've been there since.

22 Q What rent have you paid for that apartment since
23 July 1997?

24 A July 1997.

25 Q Well, let's start now. What rent are you paying
26 at the present time, if any?

27 A I'm just not good at mathematics. My -- what I
28

1 pay each month is \$388; however, that includes utilities.
2 But my section -- I mean, my part of the rent. I live with
3 my daughter and her family.

4 Q And do your daughter and her family also pay some?

5 A Yes.

6 Q What part do they pay?

7 A Half.

8 Q Has that rent been fairly stable over the past few
9 years or has it changed?

10 A Oh, it was lower than that, but it raised -- you
11 know, they raised it.

12 Q Do you recall what it was when you first moved in
13 with your daughter?

14 A No, I can't remember.

15 Q What became of the mobile home that was out in the
16 country when you moved to Albuquerque?

17 A It got vandalized, and I was advised to sell it.
18 And I tried selling it for awhile; and people would go in
19 there and steal the cupboards out of it and everything that
20 was in there. When I first left, it was the intention I
21 was just going to go for six months or a year and come back
22 when my health was better. And so I left clothing,
23 household items, furniture, washer and dryer, and all that.
24 And they all got stolen. And then they were down to
25 stripping the cupboards off the walls and everything, and
26 somebody told me somebody could start a fire in there so
27 you ought to sell it. So I did. I think I only got \$500
28

1 for it.

2 Q How much had you paid to purchase the mobile home?

3 A \$13,000.

4 Q That was in the early 1980's?

5 A Yeah.

6 Q So at the time you left and moved to Albuquerque,
7 the mobile home was still on the property and still had
8 some of the fixtures and furniture and other things?

9 A Oh, yes, it was furnished.

10 Q And after you made the decision to stay in
11 Albuquerque longer than anticipated, did you make
12 arrangements with anyone to either inhabit the mobile home
13 or to watch it or to take care of it for you?

14 A Yeah, I had -- my neighbors were there, too, and
15 they were, you know, watching it for me, but they -- And
16 somebody would call me up and tell me there's a car over
17 there or there's a pickup over there; and they'd go over
18 there to see, and the doors would be open. And that's when
19 they said that things were being stolen out of there.

20 Q When do you think you first learned that the
21 trailer home was being vandalized?

22 A I'm not exactly positive, maybe two years after or
23 three years after.

24 Q How long did that continue, that vandalism?

25 A Um, I think I had to sell it within the time I was
26 in Albuquerque, so it might have been three, four years.

27 Q And during that two or three or four year period
28

1 when you learned that the property was being vandalized but
2 before you sold it, did you do anything to try to protect
3 it from further vandalism?

4 A Well, there was two neighbors that lived down the
5 road, you know -- well, JoJo Abbott and them, and George
6 Ricker. They would tell me if there was somebody over
7 there or if they seen something, you know, they'd tell me.
8 Sometimes they would call me up and tell me.

9 Q Apparently, that system wasn't very effective in
10 stopping the vandalism as it turns out?

11 A No.

12 Q There's some indication that the first year you
13 moved onto the property you tried to grow a garden but it
14 didn't work out very well.

15 A Oh, I know it. It just didn't. I. . . It just --
16 I don't know. It just didn't. I'd water it and
17 everything. I had a sprinkler, too, that would just go
18 back and forth like that, you know; and it didn't -- it
19 just didn't take.

20 Q Now, when you moved onto the property in the early
21 1980's, your sister Abigail had been living pretty close by
22 for a number of years, correct?

23 A Um-hm.

24 Q Is that a yes?

25 A Yes.

26 Q What did she tell you about the water quality at
27 that time, when you moved onto the property?
28

1 A Well, I don't know if she told me anything about
2 water quality. I didn't really ask. I was more into the
3 trying to get myself settled in, you know.

4 Q What was the water quality like when you first
5 moved onto the property in the early 19 -----

6 A It was good. I liked it. I drank it, and I drank
7 it for a long time before I really started, um, noticing
8 some differences and seeing things in it and all that, you
9 know.

10 Q When do you think you first started noticing some
11 differences in the water?

12 A Oh, maybe a couple years after. Yeah, about that.

13 Q What changes did you notice at that time?

14 A Well, it tasted different, and it seemed like
15 there was some little black specks in it floating around.
16 I mean, I wouldn't notice it right away; but then,
17 sometimes I'd be sitting there and I'd see, you know, on
18 the bottom, some little dark specks, you know.

19 Q You say it tasted different. How did it taste?

20 A Just didn't taste the same. It didn't taste good
21 like it used to.

22 Q Did it taste salty?

23 A Not at first. Not at first, but after a while it
24 was kind of salty. And then that coffee, it just made the
25 coffee taste bad, you know. I used to drink coffee then;
26 and, first thing in the morning, make a pot of coffee.
27 And, after a while, it just didn't seem so great.

28

1 Q So you noticed a bad taste, you noticed some black
2 specks. Did you come to notice anything else about the
3 water quality?

4 A Later on, yeah. It smelled like boiled eggs.

5 Q Later on, you got the rotten egg smell?

6 A Um-hm. (Indicates yes.)

7 Q What else?

8 A Well, it just had a funny taste, you know, more
9 stronger funny taste. Can't exactly say what it tasted
10 like, but it just didn't taste good. Then I started
11 getting water from that well.

12 Q You started getting water from which well?

13 A No, not the well, but that, ah, spring.

14 Q When did you start getting water from the spring?

15 A I don't know. Maybe about a couple years after I
16 was living out there.

17 Q How would you transport the water from the spring
18 to your place?

19 A I used to drive. I used to have a car. I used to
20 just put my plastic jugs in the car, and I'd go out there
21 and fill them up. I could do everything by myself when I
22 moved out there. I was strong. I was walking around on my
23 own two feet. I had good eyes. I was working. And I
24 lived out there, and I could do everything; you know, I was
25 strong.

26 Q Where were you working at the time you moved out
27 to that property?
28

1 A Um, it was after Head Start. And then I would go
2 back to Hope Ranch every so often and help out, like when
3 they don't have somebody to take over for the houseparents
4 to go, you know, take a few days rest or something. I'd go
5 out there and do it 'cause I did it before.

6 Q How long did you continue in the employment at
7 Head Start?

8 A Oh, in Head Start, I worked til -- I think it was
9 1983.

10 Q All right, so when you moved the trailer home onto
11 the property, which I think we established was about 1982,
12 at that time you thought the water quality was good, but
13 later you began -- a few years later, you began to notice
14 changes in the water quality?

15 A Yeah.

16 Q And then by 1990, you had left the property to
17 move to Albuquerque because one of your friends -- your
18 sister was living down there and also one of your friends
19 recommended a diabetes clinic in Albuquerque, correct?

20 A Um-hm.

21 Q Is that a yes?

22 A Yes. By that time, I had a lot of health
23 problems. You know, I had been in the hospital for six
24 months to try to heal a lesion or ulcer on the bottom of my
25 feet. It was one side then the other. And they couldn't
26 quite heal them. They just would -- you know, they'd heal
27 them to a certain point and then when they'd want me to
28

1 start walking, well, there they would be again, you know.
2 They just couldn't heal those lesions -- I mean, those
3 ulcers. And before that, I had also eye problems, you
4 know, that I have my blindness from diabetes, retinopathy.
5 And they did an operation, and I went blind on this side,
6 this other side. I had to have an operation that gives me
7 some vision now, but at that time, I went blind for two
8 months; and they did a series of things to my eye, and it
9 took a long time to get my vision somewhat back, you know.
10 I didn't think I would get it back. They were not
11 promising anything either, but it came back to where I can
12 read, I can see things, I can even read the Bible, so.

13 Q So for a time there, you weren't able to see at
14 all?

15 A No.

16 Q How long did -----

17 A I was running into the door and everything. I was
18 still living out in the country, you know; and I shut the
19 door and sometime it would come back a little and I'd walk
20 right into it, hit myself, or the cupboard, you know, I'd
21 slam it like that and sometime that would come in and it
22 would hit me in the head, you know, and things like that.
23 Because I couldn't see it. And I had to get used to
24 knowing how many steps to go before I'd run into the table;
25 but I learned that from, just repetition, you know, in my
26 own home.

27 Q And I take it the doctors led you to understand
28

1 these vision complications were attributable to the
2 diabetes, that's one of the symptoms of diabetes?

3 A Yeah, retinopathy.

4 Q Were you able to get the relief that you
5 mentioned, after going to the clinic in Albuquerque, to get
6 the vision problems corrected?

7 A Not the vision problems but my foot. I don't have
8 ulcers on the bottom of my feet anymore. I have to be real
9 careful about things like that, because, on diabetics, they
10 don't heal good, you know.

11 Q And that's one thing you've come to understand is
12 that healing -- difficulties healing is again one of the
13 symptoms of diabetes, correct?

14 A Yeah, and you just can't take chances, you know,
15 with anything. You can't be too careful about water
16 conditions or the surrounding environment, things that, you
17 know, make your diabetes get worse, or the stress of living
18 in it, you know.

19 Q When did you receive the treatment for the vision
20 problems that you mentioned a few minutes ago?

21 A At first, one was in Denver, Colorado at the
22 Veterans Hospital. They did a -- what do they call it --
23 retractomy (*sic*), the cutting of scar tissue that was
24 caused from laser treatments. And it just didn't help. It
25 didn't help the vision. It was gone. And the other one
26 was in Minneapolis, Minnesota, and they did a number of
27 things to me. They did a retractomy (*sic*) for that scar
28

1 tissue, yes; and they did laser there, too. They did a
2 oil, ah -- put a silicone oil band in there, a gas bubble.
3 And I think if that's five, that must be it. But they did
4 five things. They told me that if I'm going to get any
5 vision back, it would come back very slowly. And like I
6 said, I do have some vision, but, legally, I'm blind;
7 'cause if I take this off, I can't even see your face. I
8 can't see anybody's face.

9 Q About when did you have the procedures in
10 Minneapolis?

11 A That was in January of 1990.

12 Q So that was before you moved down to Albuquerque?

13 A Yes.

14 Q And how long was it before you began to see the
15 positive effects of that procedure and your vision began to
16 improve? Was it overnight or did it take a few days or
17 weeks?

18 A Oh, it took a long time. In May of 1990, they had
19 to call me back over there to take that oil out of my eyes,
20 you know, the silicone oil band. They took -- I still have
21 a few drops floating around in there, but they had to take
22 that out. And then after that, I didn't see -- everything
23 I saw was light and dark or grey and dark. I couldn't see
24 colors. And then the color started coming in, but only at
25 a real close -- You know, like television, if I wanted to
26 see something, I would try to make it out; and I'd have to
27 push myself right in front of the television. But in -- I
28

1 think it was in September of that year, I went to town to
2 get some groceries. Somebody came after me, so I wrote a
3 note on the table. And how I used to do that was just put
4 my hand on there, on the paper, and then I wrote, going to
5 town or something, you know. My neighbors would come in
6 and check on me, um, my egg lady, that was Margaret Abbott.
7 She would come in and bring the eggs and put it in my
8 refrigerator. So I left that note on there. And as I was
9 going to write that, I dropped my pencil. So I reached
10 down to get it; and when I went down like this, I seen
11 those blue lines for the first time on the paper. And that
12 was when I knew that, you know, the sight was really
13 starting to come back. But it took that long from February
14 to September.

15 Q Of 1990?

16 A Yeah, to start getting that kind of something, you
17 know, telling me that I'm going to have some sight.

18 Q And this vision problem, I take it, had been
19 developing, coming on gradually over the course of a number
20 of years?

21 A No. It just happened from 1983 -- I think that my
22 eye problem started in 1983, and 1985, I think it was, and
23 then the last one was 1990 when I got that operation. But
24 that was the span for my eyes -- and from diabetes, you
25 know.

26 Q Right. You mentioned the health problems we've
27 talked about, the toe problem, the foot problem, the vision
28

1 problem, other diabetes related complications. Any other
2 health problems that you've experienced while living out at
3 the trailer home on the property that we haven't touched
4 upon?

5 A A scary one, yeah. The -- one night I went to
6 bed; and when I'd lay down, I'd put my head on a pillow and
7 I stretched out. And I was breathing, and it sounded like
8 I was breathing into a cellophane bag. It had a crinkly
9 sound, you know. And I sat up, you know, and I couldn't
10 hear it then. But I'd lay down again, and I'd hear it, you
11 know. And so I thought, well, you know, that's something
12 that I don't know about, and I'd better check with the
13 hospital. So I called up, and they told me to get somebody
14 to bring me in right away. So I called up my daughter and
15 she took me in and they admitted me. And they started
16 giving me Lasix, and I was up most of the night. And the
17 next day I got to go home around four, but they told me I
18 had congestive heart failure. And he says, because you had
19 too much salt. Do you take a lot of salt in your food, and
20 all that -- which I don't. And then that was when I kind
21 of started noticing the water was salty. And I had been,
22 you know, like I said, I didn't make coffee any more, but
23 I used it to cook with and I used it still in washing
24 dishes and taking showers, you know, and stuff like that.
25 And that water was salty.

26 Q When did this incident happen with the congestive
27 heart failure?
28

1 A I don't know. I can't remember. It's probably in
2 that hospital records where, you know, they kept me in
3 overnight, but they -- but that's what the doctor said it
4 was is congestive -- you don't have to worry about it if
5 you don't use a lot of salt. And he said, it's salt that's
6 retaining water in your body and it made a lot of pressure
7 around you, your heart.

8 Q Did you have any further problems after that one
9 incident?

10 A No.

11 Q Did you make any changes to your lifestyle after
12 that incident?

13 A No. I didn't think it was important. I didn't
14 understand what heart -- congestive heart failure was. I
15 thought it was -- Well, he said it was from salt so I
16 thought that's what it was; and I never used a lot of salt,
17 and I didn't worry about it, and I never had any more
18 problems with it til just recently. And then they told me
19 you had a heart attack before, and I said, no, I didn't.
20 And then that's when they told me congestive heart failure
21 had did some damage to my heart. I said, well, why didn't
22 somebody tell me about it?

23 Q You've had some treatment for a heart condition
24 recently?

25 A Well, they flew me out in I think it was the end
26 of February or March. They sent me to Deaconess because I
27 did have some kind of problems. I thought it was my
28

1 stomach, and I couldn't hold down any food. And no water,
2 water even, you know, everything came up. I was in the
3 hospital. Then they took care of that; and they said, are
4 you feeling better now? I said, now my chest hurts and my
5 back hurts. So Dr. Hendrickson told me that he would send
6 me to Billings. They flew me out. And before they flew me
7 out, they said, is that pain still there? And I said, yes,
8 and I have a headache, too. So they gave me nitroglycerin;
9 and at that point, well, they waited for awhile and kept
10 talking to me and said, on a scale of 1 to 10 where is it?
11 And I said, probably a 6 or a 7. So they gave me another
12 one. And then that after that, it went away.

13 Q With what physician did you treat in Billings for
14 the heart condition?

15 A Zimpoli. Zimpoli.

16 Q And that was earlier this year?

17 A Yes.

18 Q Have you had any treatment for heart conditions
19 since then?

20 A No.

21 Q In one of the documents we had received from your
22 attorney, there's an indication that, apparently, a new
23 pickup truck might help with respect to water hauling.

24 A Well, my son-in-law has a little Toyota, and there
25 is four of us; and, ah, they're adults, I'm adult, and my
26 grandson might as well say he's adult -- he's 14, and he's,
27 you know, just -- he's taller than his dad. So I don't
28

1 think that hauling water is not going to be a thing, you
2 know, with a little car; but probably a pickup truck or
3 something would be more a utility thing, you know. And
4 that's why I said that.

5 Q At the present time, you're not hauling any water
6 because you're living in town, correct?

7 A Yes, um-hm.

8 Q And at the present time, you don't have any sort
9 of a residence out in the country because the trailer home
10 has been sold, correct?

11 A Yes.

12 Q So even if you wanted to, I take it, there's no
13 place for you to live out on the country location and no
14 reason to haul water, is there?

15 A Yeah.

16 Q Okay. There's also been reference to a water
17 storage tank and a water pump. My understanding is those
18 would be alternatives for water ----

19 A If I lived out there.

20 Q --- if you lived out on the property?

21 A Yeah, um-hm.

22 Q Do you have any interest at all in going back and
23 living out on the property at the present time?

24 A Well, that's going to be taking too much; and as
25 you can see, I'm not an able person, and I don't think that
26 I'd be able to handle that.

27 Q By the way, you mentioned that you were diagnosed
28

1 with diabetes a number of years ago. Do you recall about
2 when you first learned that you were diabetic?

3 A Yeah, about 1966 -- about that.

4 Q Was the water well that you use, during that
5 period that you lived out in the country, was that drilled
6 at the time you moved out there or had that been there for
7 some time?

8 A It was just drilled prior to my moving out there.

9 Q Do you know who did it and how deep the well was?

10 A Indian Health Service, and it was twelve or
11 thirteen feet.

12 Q Did you, at that time, review any test samples or
13 other tests of the water quality?

14 A I don't recall anything, but they said it was good
15 water.

16 Q Who said that?

17 A The ones that went out there to -- I think it was
18 Tom Osborne, who was working -- he was the one that was
19 going on checking those wells and helping to drill them,
20 picking out site, things like that.

21 Q He was with Indian Health Service?

22 A Yes.

23 Q And part of what Indian Health did for you when
24 you moved out to the property was to put the well in and
25 also let you know whether the water was any good?

26 A Yes.

27 Q And they let you know the water appeared to be
28

1 acceptable -----

2 A Yes.

3 Q --- and that's when you moved the trailer home out
4 to the property?

5 A Yes.

6 Q Have you ever, so far as you can recollect, spoken
7 with anyone from either Grace Petroleum or Samson
8 Hydrocarbons?

9 A No.

10 Q Did there come a time after the water quality
11 began to deteriorate, which you indicated was some time in
12 the mid or late 1980's, that you at least suspected that
13 the oil field activities might be the source of the
14 problem?

15 A No, I just thought that because I used to -- right
16 out of my kitchen window, I could look out there and see
17 that lit up oil well, you know, and then it was not lit up
18 anymore.

19 Q And when you say thought that, you mean, thought
20 that the oil field activities likely could be the source of
21 the water problems?

22 A Yeah, um-hm.

23 Q Is that yes?

24 A Yes.

25 Q And that was when you first began to notice the
26 deterioration back in the 1980's?

27 A About that.

28

1 Q Did you speak with anyone at the oil companies
2 about that concern?

3 A No.

4 Q Did you speak with anyone of Indian Health or with
5 the Tribe about that concern?

6 A Just the doctors.

7 Q What did you tell the doctors?

8 A I just told them that, you know, the more I used
9 it, the more it got worse, you know.

10 Q But I'm focusing on whether the oil field
11 activities were a contributing source. Did you discuss
12 that with your physicians?

13 A No, not really.

14 MR. STERUP: I think that's all I have at this time. Thank
15 you.

16 EXAMINATION BY MR. WEBSTER:

17 Q Irma, my name's Mike Webster; and as I told your
18 sister, I represent Murphy Exploration in this matter. I
19 don't have very many questions. Can you tell me, have you
20 ever spoken with any of the Murphy Exploration people about
21 your water problems out there?

22 A No.

23 Q Do you know Ray Reede?

24 A No.

25 Q And I think that you were previously asked whether
26 you had spoken to the Indian Health Service people about
27 your water quality; and if I recall, your answer was no,
28

1 you hadn't?

2 A No.

3 Q And that same answer as far as talking to anybody
4 at the Fort Peck Tribes about your water, is that right?

5 A Yes.

6 Q When the USGS people were out and conducted their
7 water surveys and what not, did you ever see them out in
8 the field at any time when they were doing that?

9 A Yeah, once. There was a lady.

10 Q Did you talk to that lady?

11 A Yes.

12 Q Do you recall what her name was?

13 A No. I didn't ask her.

14 Q She identified herself, though, as being with the
15 USGS?

16 A Yes.

17 Q And what -- do you recall what you talked about?

18 A Oh, she told me that it was in with -- in the, um,
19 norm for EPA or something like that, you know. And, um, I
20 offered her a glass of water, and she said, no, I'm not
21 thirsty.

22 Q And that was at -- while you were residing out in
23 your -----

24 A Yeah, unhunh, because I was home, and I had some
25 company; and she was doing that, you know. They were doing
26 that at that time.

27 Q So that would have been probably back about 1989,
28

1 1990, is that right?

2 A Could have been, yeah. I'm not sure exactly when
3 this -- didn't remember the date.

4 Q So it could have been earlier than that?

5 A Might have been.

6 Q You said the well for your home is on the west
7 side of your house?

8 A Um-hm. Um-hm. (Indicates yes.)

9 Q And that it's a couple feet away from the wall?

10 A Yeah, from the trailer. Um-hm. (Indicates yes.)

11

12 Q Where is the septic system for -----

13 A On the west side.

14 Q It also is on the west side?

15 A Ah, well, no, the well is on the east side. I'm
16 sorry. I'm mistaken there. It was toward the east side,
17 I know is when the sun comes up, you see it good. The
18 septic tank was on the west side, and it was kind of on the
19 slope down, a little bit -- This was kind of like on a
20 little hill, and it was down the hill.

21 Q So you had the water well was on one side of your
22 home, and the septic system on the other side and the
23 septic system ran downhill?

24 A Yeah.

25 Q Did you ever have any problems with your septic
26 system out there?

27 A No. They would come and clean it out every so
28

1 often, you know. It was all right.

2 Q Did you ever have a water conditioner at your home
3 out there?

4 A Water conditioner. No, I don't think so. We had
5 to start getting Culligan water for awhile.

6 Q Was that bottled water? Is that -----

7 A Um-hm. (Indicates yes.) He would come in and
8 put it in, take the empties, you know.

9 Q Do you remember when you started getting bottled
10 water while you lived out there?

11 A Oh, not the exact date, but it was after the
12 doctor told me I shouldn't have salty stuff; and if the
13 water was salty, I should have bottled water.

14 Q Did the Culligan person, do you know, did they
15 service more people out in that area than just you?

16 A I don't know.

17 Q You don't know whether they -----

18 A I don't know because I would just -- you know,
19 when I'd see that -- hear that noise coming, you know, I
20 knew that was him.

21 Q Do you remember about when you had -- and I
22 believe this was asked, and I apologize for not writing it
23 down. Do you remember when you had your congestive heart
24 failure episode, about what year that was?

25 A To the best I can remember, I think it was in the
26 middle 80's, maybe -- I'm not exactly sure of the date.

27 Q Sometime after that, though, then, until you moved
28

1 off the property in 1990, you were getting Culligan water
2 delivered to your house for you to drink?

3 A Um-hm. (Indicates yes.)

4 Q Did you also use it then to cook with?

5 A Sometimes.

6 Q Do you recall what -- as I remember, you had
7 indicated there were black particles or whatever in your
8 tap water?

9 A In my -- yeah. If I'd drink water with a glass,
10 you know, and I'd drink it like that, well, when it got
11 down, I could see some things on the bottom of the glass,
12 you know. I'd go to the sink and go like that, you know,
13 and try to see what it was, you know. Just specks.

14 Q And was that then pretty regular? I mean, it
15 wasn't -- did it happen every once in a while or did it
16 happen nearly all the time when you got water?

17 A After I started noticing it, it was regular; but
18 who knows how long it was before I started noticing that.
19 'Cause it tasted good at first, you know; and I never
20 thought it was going to change.

21 Q Why did you leave Albuquerque -- or excuse me, you
22 said you left Albuquerque to go be with your son who was
23 experiencing problems?

24 A Yeah, um-hm.

25 Q Why did you leave Santa Ana and come back to
26 Poplar?

27 A Well, at that time, he had a job, he was doing
28

1 good, but my granddaughter had just -- another reason we
2 went to Santa Ana was because of their -- they had a ROTC
3 program in the high school. My daughter's oldest child was
4 in ROTC, and she wanted to continue for the last two years
5 of her high school. So we called down there to find out if
6 there really was, you know, something that she could go to.
7 And then since it was, well, then we went down there; and
8 she got to finish her last two years in high school in
9 ROTC.

10 Q And when that was all done and your son was kind
11 of back on his feet and his life had turned around and
12 things were squared away, then you got homesick or ----

13 A No.

14 Q --- you just decided to come back?

15 A We decided to come back because we felt like our
16 obligation there was done. My granddaughter Katerri joined
17 the US Marine Corp right after graduation, and so we left
18 the last day of June.

19 Q Your leaving there then was really kind of a
20 personal choice?

21 A Yes.

22 MR. WEBSTER: I don't think I have anything else.

23 EXAMINATION BY MR. FAGAN:

24 Q Hi, Irma, I'm Gerry Fagan.

25 A Hi.

26 Q I represent Marathon Oil. Have you ever talked
27 with a Marathon Oil employee?
28

1 A No.

2 Q How about a Texas Oil and Gas employee?

3 A I don't think so.

4 Q Have you ever been made aware of any facts that
5 would make you think a Marathon oil well or Texas Oil and
6 Gas well had caused any problems or failed?

7 A Not that I know of.

8 MR. FAGAN: Thanks. I have no further questions.

9 EXAMINATION BY MR. ROSS:

10 Q I'm John Ross. I represent Pioneer Natural
11 Resources and Mesa Petroleum. Are you at all familiar with
12 any of the operations of Mesa Petroleum in the East Poplar
13 oil field?

14 A No.

15 MR. ROSS: Okay, thank you very much. I have no other
16 questions. Thank you very much.

17 (THERE BEING NO FURTHER QUESTIONS, THIS DEPOSITION WAS
18 THEN CONCLUDED AT 2:05 P.M.)

19

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CERTIFICATE

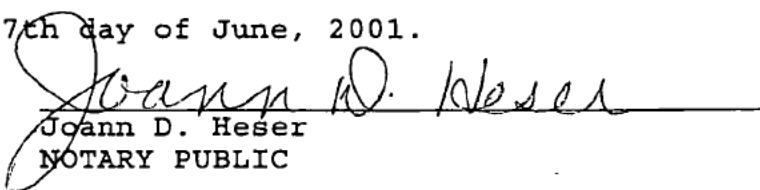
STATE OF MONTANA)
 : ss.
COUNTY OF ROOSEVELT)

I, JOANN D. HESER, Official Court Reporter, Fifteenth Judicial District, and a Notary Public duly qualified in and for the State of Montana, hereby certify there came before me the deponent herein, namely IRMA REDDOOR, who was by me duly sworn to testify to the truth and nothing but the truth concerning the matters in this cause.

I further certify that I was the Official Court Reporter who reported, by means of LANIER recorder, this deposition. The testimony therein and other proceedings herein contained are a true and correct transcription of the original tapes and my notes, TO THE BEST OF MY ABILITY.

I further certify that I am not related in any manner to any party, witness, or counsel and have no financial or other interest in the outcome of the above entitled cause.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Notarial Seal this 27th day of June, 2001.


Joann D. Heser
NOTARY PUBLIC

My Comm. exp. 7/2/2004

DEPONENT'S CERTIFICATE

I, IRMA REDDOOR, do hereby certify that I have read the foregoing transcript of my testimony and that the same is a full, true and correct record of my deposition except as to any corrections I have listed on the Corrections to Deposition form.

_____ Changes and corrections made.

_____ No changes or corrections made.

IRMA REDDOOR

Subscribed and sworn to before me this _____ day of _____, 2001.

NOTARY PUBLIC for the State of Montana
Residing at _____, Montana
My Commission expires _____

CORRECTIONS TO DEPOSITION

The Deponent, IRMA REDDOOR, states she wishes to make the following changes in testimony as originally sworn:

<u>PAGE</u>	<u>LINE</u>	<u>SHOULD READ</u>	<u>REASON</u>
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IRMA REDDOOR

1
2
3 IN THE UNITED STATES DISTRICT COURT
4 FOR THE DISTRICT OF MONTANA
5 BILLINGS DIVISION
6
7 CARY G. YOUNG, et al.,
8
9 Plaintiffs,
10 vs.
11 MURPHY OIL USA, INC., et al., Cause No. CV 98-108-BLG-JDS
12 Defendants. Judge Jack D. Shanstrom
13
14 MESA PETROLEUM and PIONEER
15 NATURAL RESOURCES, USA, INC.,
16 Defendants/
17 Third Party Plaintiffs & Cross Plaintiffs,
18 vs.
19 AMARCO RESOURCES CORP.
20 BESTWAY INC.; WESTDALE
21 PETROLEUM INC.; and THE
22 PRUDENTIAL GROUP,
23 Third Party Defendants.
24 vs.
25 JOHN DOES 4-50,
26 Cross-Defendants.
27
28 TIME: Tuesday, June 12, 2001 at 1:12 p.m.
PLACE: Sherman Motor Inn, 200 East Main, Wolf Point, MT

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5	DEPONENT:
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1
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9
10 ALSO PRESENT:
11 Abigail Reddoor

Page 4
1 BE IT REMEMBERED: That the oral deposition of IRMA
2 REDDOOR was taken at 1:12 p.m. on the 12th day of June,
3 2001 at the Sherman Motor Inn, 200 East Main, Wolf Point,
4 Montana, with the appearances of counsel hereinbefore
5 noted, before Joann D. Hescr, Official Court Reporter and
6 Notary Public for the State of Montana.
7 The following proceedings were had:
8
9 Whereupon,
10 IRMA REDDOOR
11 called for examination, and being first duly sworn upon her
12 oath, testified as follows:
13 EXAMINATION BY MR. STERUP:
14 Q Please state your name for the record.
15 A Irma Florence Reddoor.
16 Q Irma, where do you reside at the present time?
17 A In Poplar.
18 Q At what location?
19 A [REDACTED]
20 Q How long have you lived in the Poplar area?
21 A Since 1997.
22 Q Where were you born?
23 A Poplar.
24 Q What year?
25 A 1935.
26 Q Have you ever lived outside of the Poplar area for
27 any significant periods of time?
28

Page 5

Page 7

1 A Outside of the state, yes. I was in the U.S.
 2 Navy; and for a time, I was in the east coast. And then I
 3 got married. My husband was in the Marines. We lived in
 4 Virginia and North Carolina and Hawaii and California. And
 5 I lived in California for 13 years. And I came back to
 6 Montana. Then I went to Albuquerque, and then from there
 7 I went to California for two years, and then I came home.
 8 Q It sounds like after growing up in the Poplar
 9 area, you then lived in other places for quite a number of
 10 years before then coming back to Poplar?
 11 A Yes.
 12 Q When did you come back to Poplar?
 13 A 1980 or '81. Anyway, it was when the volcano
 14 erupted here ----
 15 Q Mount St. Helens.
 16 A Mount Helens.
 17 Q Okay. And why did you move back to the Poplar
 18 area in either 1980 or 1981?
 19 A I was divorced, and I was -- I divorced and I was
 20 re-married and I just wanted to come home.
 21 Q Now, the property that we're primarily interested
 22 in for today's purposes has been identified as a six acre
 23 tract surrounding the well denoted M27.
 24 A Yes.
 25 Q You were here for your sister Abigail's
 26 deposition. About how far is your property, the M27
 27 property, from your sister's property?
 28

1 A Yes. It was my grandmother Blanche Reddoor.
 2 Q At the time you moved into the mobile home on the
 3 property, who was living with you?
 4 A My husband and I.
 5 Q What was his name?
 6 A Thomas Frazier.
 7 Q How long did he continue to live at that property?
 8 A Oh, 1987, I think -- as far as I can remember.
 9 Q And what happened at that time?
 10 A We separated and later divorced.
 11 Q How long did you continue to live at that
 12 property?
 13 A 1990.
 14 Q So you moved to the property in about 1981, having
 15 moved a mobile home out there, and then you stayed on the
 16 property until sometime in 1990 when you moved off and
 17 lived elsewhere? Is that accurate?
 18 A No, because I was out at the Hope Ranch for a
 19 time. I would say nineteen -- just prior to 1983 or maybe
 20 it was in '93 that I moved that mobile home out there.
 21 Q So maybe that was around 1983?
 22 A Um-hm. It might have been. It could have been
 23 '82. I'm just not really sure.
 24 Q And where did you then move in 1990?
 25 A Albuquerque.
 26 Q Why did you move to Albuquerque in 1990?
 27 A Well, um, my sister was going to go down there,
 28

Page 6

Page 8

1 A Well, I guess about a quarter of a mile. I would
 2 guess that because I used to cut across and walk over there
 3 sometime.
 4 Q And so you and your sister's houses were separated
 5 by about a quarter of a mile?
 6 A About that.
 7 Q And how far was the well M27 from the house, your
 8 house, if you know?
 9 A Um, my well you're talking about, right?
 10 Q Yes.
 11 A It was just a few feet. Well, maybe it was two
 12 feet.
 13 Q Just right there next to the house?
 14 A Yeah, um-hm -- west.
 15 Q You came back to the Poplar area in the early
 16 1980's. The house that you moved into, had that been there
 17 for some time?
 18 A Well, when I came back, I didn't have a house. I
 19 worked at Hope Ranch. And then I bought a trailer house,
 20 and this trailer house is what I had moved out there.
 21 Q So for a time you lived in the town of Poplar?
 22 A Yes.
 23 Q And then later you bought a mobile home, a trailer
 24 house, and moved it out to the country property?
 25 A Yes.
 26 Q And how did you come to acquire the six acres that
 27 you placed the mobile home on? Was that an inheritance?
 28

1 and I was having a lot of health problems; and I had a
 2 friend that was living down there, and she was telling me
 3 I should check into their diabetic program down there
 4 because it was very -- it was very good. And I thought,
 5 well, my family was all -- you know, they were married, had
 6 their own families, so I agreed to go down. I was just
 7 going to go down for maybe six months or a year, but I
 8 stayed down there for five years.
 9 Q Where did you live when you were in Albuquerque?
 10 A Um, it was an apartment close to where she worked.
 11 Q Close to where Abigail worked?
 12 A Yeah. It was called Plantation Manor.
 13 Q Did you and Abigail live together at that time? or
 14 did you have your separate apartments?
 15 A No, I had to live close to where she was and have
 16 her help because I was already in this wheelchair.
 17 Q You mentioned that you went to Albuquerque in part
 18 because of health problems and treatment for diabetes?
 19 A Yes. Um-hm.
 20 Q Had you treated with a doctor for diabetes while
 21 you were still living in the Poplar area?
 22 A Yes. And another place, too. I have had diabetes
 23 about 35 years.
 24 Q Who did you treat with in the Poplar area for your
 25 diabetes?
 26 A Indian Health Service.
 27 Q Any particular physician?
 28

Page 9

1 A No. Anyone that came in, I guess.
 2 Q During the period when you lived out at the mobile
 3 home prior to 1990, did the Indian Health doctors prescribe
 4 any particular medication or course of treatment for your
 5 diabetes?
 6 A Well, when I first went back there, they put me on
 7 insulin and then I had to go through a time of adjustment
 8 for that. But before that, I was on medi -- you know,
 9 pills. So it was a time to go through that; but, ah, I had
 10 a lot of medications from -- for infections and things like
 11 that, you know, from the doctors.
 12 Q What do you mean, infections?
 13 A Ah, like I had a toe infection, and they told me
 14 to soak my feet three times a day in a bath of, oh,
 15 betadine and water; and I did that, and the infection got
 16 worse. And it was so accelerated that they sent me right
 17 away to Williston and had it amputated. It just seemed to
 18 get worse and worse, you know; and they said, are you sure
 19 you're soaking your feet three times? I was! And it just
 20 didn't help. It just got worse. And then they had to
 21 remove that toe.
 22 Q About when did they remove the toe?
 23 A I would say -- well, when they told me at the
 24 hospital, they sent me that week. And, so, it -- whatever
 25 it -- I can't remember the exact date of when it was, but
 26 I -- they didn't wait too long. You know, they -- it was
 27 like a day or two after.
 28

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1 Q About what year do you think it was that you had
 2 the toe amputation?
 3 A 1985, 19 -- yeah, I would say about 1985.
 4 Q How long before that had you sustained the initial
 5 injury to the toe? the original infection? days, weeks,
 6 months, years?
 7 A It wasn't really an injury, it was -- I was
 8 walking; and right underneath the big toe, there's a little
 9 line just like under your finger here, and that popped
 10 open. I used to take showers every day, and my skin was
 11 getting very dry; and I would put lots of lotion on and
 12 everything. But just from standing -- you know, walking on
 13 it, it popped open. And that's what got infected. I guess
 14 I just thought water was going to help me, you know; and I
 15 just kept on soaking it and taking showers and it just --
 16 it dried out and it got infected. The skin just lifted off
 17 of there.
 18 Q You said you treated with a physician who
 19 recommended that you soak the toe. Who was that physician?
 20 A I can't remember who it was. They come and they
 21 go so fast. It could have been, ah, Dr. Bunt or, ah --
 22 anyway, in the 1980's, it was a long time ago; and like I
 23 said, they come and they go and I don't always get the same
 24 physician.
 25 Q That doctor was at the Indian Health Service in
 26 Poplar?
 27 A Yes.
 28

Page 11

1 Q So the records at that location, if they still
 2 exist, would reflect that you treated with him for the toe
 3 problems, I take it?
 4 A Yeah, but it wouldn't have been him all the time.
 5 Like I said, they don't give me ----
 6 Q Or with someone?
 7 A Yeah.
 8 Q And then you indicated that you soaked it in water
 9 with what was it?
 10 A Betadine.
 11 Q And that's a prescription you got from one of the
 12 local pharmacies, I take it.
 13 A Yeah. Well, from there, they gave me the bottle
 14 of betadine you squirt in with the water, you know, and you
 15 soak your foot in it.
 16 Q And how long were you observing that procedure
 17 before you were told you had to have the toe amputated, was
 18 it days, weeks, months?
 19 A Maybe it was a week.
 20 Q Maybe a week?
 21 A Um-hm. (Indicates yes.)
 22 Q Did the water that you used to soak it with, where
 23 did you get that water?
 24 A The tap.
 25 Q From your residence, the trailer home?
 26 A Yeah, um-hm.
 27 Q Did anyone ever suggest to you that the reason the
 28

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1 toe was infected and had to be amputated had something to
 2 do with the quality of the water?
 3 A They didn't say. They didn't come right out and
 4 say it, 'cause they didn't want it to be quoted.
 5 Q So there's no physician that, at that time,
 6 suggested there was any connection between your toe
 7 problems and the water quality. They didn't come out and
 8 say that?
 9 A No, they didn't come right out and say it.
 10 Q I wanted to continue to track through where you
 11 lived and when, before we come back to some of these other
 12 issues. You indicated that you moved to Albuquerque in
 13 1990 and stayed until sometime in 1995, is that accurate?
 14 A Um-hm. Um-hm. (Indicates yes.)
 15 Q And at that point where did you move to?
 16 A California.
 17 Q Where did you live in California?
 18 A The house where I raised my children, and it was
 19 in Santa Ana.
 20 Q Did you still have children or other relatives in
 21 that area?
 22 A In that area, yes.
 23 Q And what was the reason for moving from
 24 Albuquerque to Santa Ana?
 25 A Um, my son was, um, having problems. He had come
 26 out of the Air Force. Well, what the big problem was was,
 27 ah, bankruptcy; and his wife left him, and he had four
 28

Page 13

Page 15

1 children. So I and my daughter decided we was going to go
2 over there and help him take care of those children, so he
3 can get a job and get back on his feet. So we went down
4 there from Albuquerque.

5 Q How long did you then continue to live in Santa
6 Ana?

7 A Two years.

8 Q And where did you move at that time?

9 A Back here to Poplar.

10 Q That was in 1997?

11 A Yes.

12 Q Do you recall what month of the year?

13 A July 4th.

14 Q Where in Poplar did you live at that time?

15 A I just brought in -- I was -- I didn't really --
16 there was those apartments I'm living in now. There was
17 one apartment that my son wanted to get into, so I helped
18 him. I stayed with him for a month or two. And then this
19 other apartment came open; and so my daughter and her
20 family moved in there, and I moved in there with her. And
21 we've been there since.

22 Q What rent have you paid for that apartment since
23 July 1997?

24 A July 1997.

25 Q Well, let's start now. What rent are you paying
26 at the present time, if any?

27 A I'm just not good at mathematics. My -- what I
28

1 for it.

2 Q How much had you paid to purchase the mobile home?

3 A \$13,000.

4 Q That was in the early 1980's?

5 A Yeah.

6 Q So at the time you left and moved to Albuquerque,
7 the mobile home was still on the property and still had
8 some of the fixtures and furniture and other things?

9 A Oh, yes, it was furnished.

10 Q And after you made the decision to stay in
11 Albuquerque longer than anticipated, did you make
12 arrangements with anyone to either inhabit the mobile home
13 or to watch it or to take care of it for you?

14 A Yeah, I had -- my neighbors were there, too, and
15 they were, you know, watching it for me, but they -- And
16 somebody would call me up and tell me there's a car over
17 there or there's a pickup over there; and they'd go over
18 there to see, and the doors would be open. And that's when
19 they said that things were being stolen out of there.

20 Q When do you think you first learned that the
21 trailer home was being vandalized?

22 A I'm not exactly positive, maybe two years after or
23 three years after.

24 Q How long did that continue, that vandalism?

25 A Um, I think I had to sell it within the time I was
26 in Albuquerque, so it might have been three, four years.

27 Q And during that two or three or four year period
28

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Page 16

1 pay each month is \$388; however, that includes utilities.
2 But my section -- I mean, my part of the rent. I live with
3 my daughter and her family.

4 Q And do your daughter and her family also pay some?

5 A Yes.

6 Q What part do they pay?

7 A Half.

8 Q Has that rent been fairly stable over the past few
9 years or has it changed?

10 A Oh, it was lower than that, but it raised -- you
11 know, they raised it.

12 Q Do you recall what it was when you first moved in
13 with your daughter?

14 A No, I can't remember.

15 Q What became of the mobile home that was out in the
16 country when you moved to Albuquerque?

17 A It got vandalized, and I was advised to sell it.
18 And I tried selling it for awhile; and people would go in
19 there and steal the cupboards out of it and everything that
20 was in there. When I first left, it was the intention I
21 was just going to go for six months or a year and come back
22 when my health was better. And so I left clothing,
23 household items, furniture, washer and dryer, and all that.
24 And they all got stolen. And then they were down to
25 stripping the cupboards off the walls and everything, and
26 somebody told me somebody could start a fire in there so
27 you ought to sell it. So I did. I think I only got \$500
28

1 when you learned that the property was being vandalized but
2 before you sold it, did you do anything to try to protect
3 it from further vandalism?

4 A Well, there was two neighbors that lived down the
5 road, you know -- well, JoJo Abbott and them, and George
6 Ricker. They would tell me if there was somebody over
7 there or if they seen something, you know, they'd tell me.
8 Sometimes they would call me up and tell me.

9 Q Apparently, that system wasn't very effective in
10 stopping the vandalism as it turns out?

11 A No.

12 Q There's some indication that the first year you
13 moved onto the property you tried to grow a garden but it
14 didn't work out very well.

15 A Oh, I know it. It just didn't. I... It just --
16 I don't know. It just didn't. I'd water it and
17 everything. I had a sprinkler, too, that would just go
18 back and forth like that, you know; and it didn't -- it
19 just didn't take.

20 Q Now, when you moved onto the property in the early
21 1980's, your sister Abigail had been living pretty close by
22 for a number of years, correct?

23 A Um-hm.

24 Q Is that a yes?

25 A Yes.

26 Q What did she tell you about the water quality at
27 that time, when you moved onto the property?
28

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1 A Well, I don't know if she told me anything about
2 water quality. I didn't really ask. I was more into the
3 trying to get myself settled in, you know.
4 Q What was the water quality like when you first
5 moved onto the property in the early 19 ----
6 A It was good. I liked it. I drank it, and I drank
7 it for a long time before I really started, um, noticing
8 some differences and seeing things in it and all that, you
9 know.
10 Q When do you think you first started noticing some
11 differences in the water?
12 A Oh, maybe a couple years after. Yeah, about that.
13 Q What changes did you notice at that time?
14 A Well, it tasted different, and it seemed like
15 there was some little black specks in it floating around.
16 I mean, I wouldn't notice it right away; but then,
17 sometimes I'd be sitting there and I'd see, you know, on
18 the bottom, some little dark specks, you know.
19 Q You say it tasted different. How did it taste?
20 A Just didn't taste the same. It didn't taste good
21 like it used to.
22 Q Did it taste salty?
23 A Not at first. Not at first, but after a while it
24 was kind of salty. And then that coffee, it just made the
25 coffee taste bad, you know. I used to drink coffee then;
26 and, first thing in the morning, make a pot of coffee.
27 And, after a while, it just didn't seem so great.
28

Page 18

1 Q So you noticed a bad taste, you noticed some black
2 specks. Did you come to notice anything else about the
3 water quality?
4 A Later on, yeah. It smelled like boiled eggs.
5 Q Later on, you got the rotten egg smell?
6 A Um-hm. (Indicates yes.)
7 Q What else?
8 A Well, it just had a funny taste, you know, more
9 stronger funny taste. Can't exactly say what it tasted
10 like, but it just didn't taste good. Then I started
11 getting water from that well.
12 Q You started getting water from which well?
13 A No, not the well, but that, ah, spring.
14 Q When did you start getting water from the spring?
15 A I don't know. Maybe about a couple years after I
16 was living out there.
17 Q How would you transport the water from the spring
18 to your place?
19 A I used to drive. I used to have a car. I used to
20 just put my plastic jugs in the car, and I'd go out there
21 and fill them up. I could do everything by myself when I
22 moved out there. I was strong. I was walking around on my
23 own two feet. I had good eyes. I was working. And I
24 lived out there, and I could do everything; you know, I was
25 strong.
26 Q Where were you working at the time you moved out
27 to that property?
28

Page 19

1 A Um, it was after Head Start. And then I would go
2 back to Hope Ranch every so often and help out, like when
3 they don't have somebody to take over for the houseparents
4 to go, you know, take a few days rest or something. I'd go
5 out there and do it 'cause I did it before.
6 Q How long did you continue in the employment at
7 Head Start?
8 A Oh, in Head Start, I worked til -- I think it was
9 1983.
10 Q All right, so when you moved the trailer home onto
11 the property, which I think we established was about 1982,
12 at that time you thought the water quality was good, but
13 later you began -- a few years later, you began to notice
14 changes in the water quality?
15 A Yeah.
16 Q And then by 1990, you had left the property to
17 move to Albuquerque because one of your friends -- your
18 sister was living down there and also one of your friends
19 recommended a diabetes clinic in Albuquerque, correct?
20 A Um-hm.
21 Q Is that a yes?
22 A Yes. By that time, I had a lot of health
23 problems. You know, I had been in the hospital for six
24 months to try to heal a lesion or ulcer on the bottom of my
25 feet. It was one side then the other. And they couldn't
26 quite heal them. They just would -- you know, they'd heal
27 them to a certain point and then when they'd want me to
28

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1 start walking, well, there they would be again, you know.
2 They just couldn't heal those lesions -- I mean, those
3 ulcers. And before that, I had also eye problems, you
4 know, that I have my blindness from diabetes, retinopathy.
5 And they did an operation, and I went blind on this side,
6 this other side. I had to have an operation that gives me
7 some vision now, but at that time, I went blind for two
8 months; and they did a series of things to my eye, and it
9 took a long time to get my vision somewhat back, you know.
10 I didn't think I would get it back. They were not
11 promising anything either, but it came back to where I can
12 read, I can see things, I can even read the Bible, so.
13 Q So for a time there, you weren't able to see at
14 all?
15 A No.
16 Q How long did ----
17 A I was running into the door and everything. I was
18 still living out in the country, you know; and I shut the
19 door and sometime it would come back a little and I'd walk
20 right into it, hit myself, or the cupboard, you know, I'd
21 slam it like that and sometime that would come in and it
22 would hit me in the head, you know, and things like that.
23 Because I couldn't see it. And I had to get used to
24 knowing how many steps to go before I'd run into the table;
25 but I learned that from, just repetition, you know, in my
26 own home.
27 Q And I take it the doctors led you to understand
28

Page 21

1 these vision complications were attributable to the
 2 diabetes, that's one of the symptoms of diabetes?
 3 A Yeah, retinopathy.
 4 Q Were you able to get the relief that you
 5 mentioned, after going to the clinic in Albuquerque, to get
 6 the vision problems corrected?
 7 A Not the vision problems but my foot. I don't have
 8 ulcers on the bottom of my feet anymore. I have to be real
 9 careful about things like that, because, on diabetics, they
 10 don't heal good, you know.
 11 Q And that's one thing you've come to understand is
 12 that healing -- difficulties healing is again one of the
 13 symptoms of diabetes, correct?
 14 A Yeah, and you just can't take chances, you know,
 15 with anything. You can't be too careful about water
 16 conditions or the surrounding environment, things that, you
 17 know, make your diabetes get worse, or the stress of living
 18 in it, you know.
 19 Q When did you receive the treatment for the vision
 20 problems that you mentioned a few minutes ago?
 21 A At first, one was in Denver, Colorado at the
 22 Veterans Hospital. They did a -- what do they call it --
 23 retractomy (sic), the cutting of scar tissue that was
 24 caused from laser treatments. And it just didn't help. It
 25 didn't help the vision. It was gone. And the other one
 26 was in Minneapolis, Minnesota, and they did a number of
 27 things to me. They did a retractomy (sic) for that scar
 28

Page 22

1 tissue, yes; and they did laser there, too. They did a
 2 oil, ah -- put a silicone oil band in there, a gas bubble.
 3 And I think if that's five, that must be it. But they did
 4 five things. They told me that if I'm going to get any
 5 vision back, it would come back very slowly. And like I
 6 said, I do have some vision, but, legally, I'm blind;
 7 'cause if I take this off, I can't even see your face. I
 8 can't see anybody's face.
 9 Q About when did you have the procedures in
 10 Minneapolis?
 11 A That was in January of 1990.
 12 Q So that was before you moved down to Albuquerque?
 13 A Yes.
 14 Q And how long was it before you began to see the
 15 positive effects of that procedure and your vision began to
 16 improve? Was it overnight or did it take a few days or
 17 weeks?
 18 A Oh, it took a long time. In May of 1990, they had
 19 to call me back over there to take that oil out of my eyes,
 20 you know, the silicone oil band. They took -- I still have
 21 a few drops floating around in there, but they had to take
 22 that out. And then after that, I didn't see -- everything
 23 I saw was light and dark or grey and dark. I couldn't see
 24 colors. And then the color started coming in, but only at
 25 a real close -- You know, like television, if I wanted to
 26 see something, I would try to make it out; and I'd have to
 27 push myself right in front of the television. But in -- I
 28

Page 23

1 think it was in September of that year, I went to town to
 2 get some groceries. Somebody came after me, so I wrote a
 3 note on the table. And how I used to do that was just put
 4 my hand on there, on the paper, and then I wrote, going to
 5 town or something, you know. My neighbors would come in
 6 and check on me, um, my egg lady, that was Margaret Abbott.
 7 She would come in and bring the eggs and put it in my
 8 refrigerator. So I left that note on there. And as I was
 9 going to write that, I dropped my pencil. So I reached
 10 down to get it; and when I went down like this, I seen
 11 those blue lines for the first time on the paper. And that
 12 was when I knew that, you know, the sight was really
 13 starting to come back. But it took that long from February
 14 to September.
 15 Q Of 1990?
 16 A Yeah, to start getting that kind of something, you
 17 know, telling me that I'm going to have some sight.
 18 Q And this vision problem, I take it, had been
 19 developing, coming on gradually over the course of a number
 20 of years?
 21 A No. It just happened from 1983 -- I think that my
 22 eye problem started in 1983, and 1985, I think it was, and
 23 then the last one was 1990 when I got that operation. But
 24 that was the span for my eyes -- and from diabetes, you
 25 know.
 26 Q Right. You mentioned the health problems we've
 27 talked about, the toe problem, the foot problem, the vision
 28

Page 24

1 problem, other diabetes related complications. Any other
 2 health problems that you've experienced while living out at
 3 the trailer home on the property that we haven't touched
 4 upon?
 5 A A scary one, yeah. The -- one night I went to
 6 bed; and when I'd lay down, I'd put my head on a pillow and
 7 I stretched out. And I was breathing, and it sounded like
 8 I was breathing into a cellophane bag. It had a crinkly
 9 sound, you know. And I sat up, you know, and I couldn't
 10 hear it then. But I'd lay down again, and I'd hear it, you
 11 know. And so I thought, well, you know, that's something
 12 that I don't know about, and I'd better check with the
 13 hospital. So I called up, and they told me to get somebody
 14 to bring me in right away. So I called up my daughter and
 15 she took me in and they admitted me. And they started
 16 giving me Lasix, and I was up most of the night. And the
 17 next day I got to go home around four, but they told me I
 18 had congestive heart failure. And he says, because you had
 19 too much salt. Do you take a lot of salt in your food, and
 20 all that -- which I don't. And then that was when I kind
 21 of started noticing the water was salty. And I had been,
 22 you know, like I said, I didn't make coffee any more, but
 23 I used it to cook with and I used it still in washing
 24 dishes and taking showers, you know, and stuff like that.
 25 And that water was salty.
 26 Q When did this incident happen with the congestive
 27 heart failure?
 28

Page 25

Page 27

1 A I don't know. I can't remember. It's probably in
2 that hospital records where, you know, they kept me in
3 overnight, but they -- but that's what the doctor said it
4 was is congestive -- you don't have to worry about it if
5 you don't use a lot of salt. And he said, it's salt that's
6 retaining water in your body and it made a lot of pressure
7 around you, your heart.

8 Q Did you have any further problems after that one
9 incident?

10 A No.

11 Q Did you make any changes to your lifestyle after
12 that incident?

13 A No. I didn't think it was important. I didn't
14 understand what heart -- congestive heart failure was. I
15 thought it was -- Well, he said it was from salt so I
16 thought that's what it was; and I never used a lot of salt,
17 and I didn't worry about it, and I never had any more
18 problems with it til just recently. And then they told me
19 you had a heart attack before, and I said, no, I didn't.
20 And then that's when they told me congestive heart failure
21 had did some damage to my heart. I said, well, why didn't
22 somebody tell me about it?

23 Q You've had some treatment for a heart condition
24 recently?

25 A Well, they flew me out in I think it was the end
26 of February or March. They sent me to Deaconess because I
27 did have some kind of problems. I thought it was my
28

1 think that hauling water is not going to be a thing, you
2 know, with a little car; but probably a pickup truck or
3 something would be more a utility thing, you know. And
4 that's why I said that.

5 Q At the present time, you're not hauling any water
6 because you're living in town, correct?

7 A Yes, um-hm.

8 Q And at the present time, you don't have any sort
9 of a residence out in the country because the trailer home
10 has been sold, correct?

11 A Yes.

12 Q So even if you wanted to, I take it, there's no
13 place for you to live out on the country location and no
14 reason to haul water, is there?

15 A Yeah.

16 Q Okay. There's also been reference to a water
17 storage tank and a water pump. My understanding is those
18 would be alternatives for water ---

19 A If I lived out there.

20 Q --- if you lived out on the property?

21 A Yeah, um-hm.

22 Q Do you have any interest at all in going back and
23 living out on the property at the present time?

24 A Well, that's going to be taking too much; and as
25 you can see, I'm not an able person, and I don't think that
26 I'd be able to handle that.

27 Q By the way, you mentioned that you were diagnosed
28

Page 26

Page 28

1 stomach, and I couldn't hold down any food. And no water,
2 water even, you know, everything came up. I was in the
3 hospital. Then they took care of that; and they said, are
4 you feeling better now? I said, now my chest hurts and my
5 back hurts. So Dr. Hendrickson told me that he would send
6 me to Billings. They flew me out. And before they flew me
7 out, they said, is that pain still there? And I said, yes,
8 and I have a headache, too. So they gave me nitroglycerin;
9 and at that point, well, they waited for awhile and kept
10 talking to me and said, on a scale of 1 to 10 where is it?
11 And I said, probably a 6 or a 7. So they gave me another
12 one. And then that after that, it went away.

13 Q With what physician did you treat in Billings for
14 the heart condition?

15 A Zimpoli. Zimpoli.

16 Q And that was earlier this year?

17 A Yes.

18 Q Have you had any treatment for heart conditions
19 since then?

20 A No.

21 Q In one of the documents we had received from your
22 attorney, there's an indication that, apparently, a new
23 pickup truck might help with respect to water hauling.

24 A Well, my son-in-law has a little Toyota, and there
25 is four of us; and, ah, they're adults, I'm adult, and my
26 grandson might as well say he's adult -- he's 14, and he's,
27 you know, just -- he's taller than his dad. So I don't
28

1 with diabetes a number of years ago. Do you recall about
2 when you first learned that you were diabetic?

3 A Yeah, about 1966 -- about that.

4 Q Was the water well that you use, during that
5 period that you lived out in the country, was that drilled
6 at the time you moved out there or had that been there for
7 some time?

8 A It was just drilled prior to my moving out there.

9 Q Do you know who did it and how deep the well was?

10 A Indian Health Service, and it was twelve or
11 thirteen feet.

12 Q Did you, at that time, review any test samples or
13 other tests of the water quality?

14 A I don't recall anything, but they said it was good
15 water.

16 Q Who said that?

17 A The ones that went out there to -- I think it was
18 Tom Osborne, who was working -- he was the one that was
19 going on checking those wells and helping to drill them,
20 picking out site, things like that.

21 Q He was with Indian Health Service?

22 A Yes.

23 Q And part of what Indian Health did for you when
24 you moved out to the property was to put the well in and
25 also let you know whether the water was any good?

26 A Yes.

27 Q And they let you know the water appeared to be
28

Page 29

Page 31

1 acceptable -----

2 A Yes.

3 Q --- and that's when you moved the trailer home out
4 to the property?

5 A Yes.

6 Q Have you ever, so far as you can recollect, spoken
7 with anyone from either Grace Petroleum or Samson
8 Hydrocarbons?

9 A No.

10 Q Did there come a time after the water quality
11 began to deteriorate, which you indicated was some time in
12 the mid or late 1980's, that you at least suspected that
13 the oil field activities might be the source of the
14 problem?

15 A No, I just thought that because I used to -- right
16 out of my kitchen window, I could look out there and see
17 that lit up oil well, you know, and then it was not lit up
18 anymore.

19 Q And when you say thought that, you mean, thought
20 that the oil field activities likely could be the source of
21 the water problems?

22 A Yeah, um-hm.

23 Q Is that yes?

24 A Yes.

25 Q And that was when you first began to notice the
26 deterioration back in the 1980's?

27 A About that.

28

1 you hadn't?

2 A No.

3 Q And that same answer as far as talking to anybody
4 at the Fort Peck Tribes about your water, is that right?

5 A Yes.

6 Q When the USGS people were out and conducted their
7 water surveys and what not, did you ever see them out in
8 the field at any time when they were doing that?

9 A Yeah, once. There was a lady.

10 Q Did you talk to that lady?

11 A Yes.

12 Q Do you recall what her name was?

13 A No. I didn't ask her.

14 Q She identified herself, though, as being with the
15 USGS?

16 A Yes.

17 Q And what -- do you recall what you talked about?

18 A Oh, she told me that it was in with -- in the, um,
19 norm for EPA or something like that, you know. And, um, I
20 offered her a glass of water, and she said, no, I'm not
21 thirsty.

22 Q And that was at -- while you were residing out in
23 your -----

24 A Yeah, unhunh, because I was home, and I had some
25 company; and she was doing that, you know. They were doing
26 that at that time.

27 Q So that would have been probably back about 1989,
28

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1 Q Did you speak with anyone at the oil companies
2 about that concern?

3 A No.

4 Q Did you speak with anyone of Indian Health or with
5 the Tribe about that concern?

6 A Just the doctors.

7 Q What did you tell the doctors?

8 A I just told them that, you know, the more I used
9 it, the more it got worse, you know.

10 Q But I'm focusing on whether the oil field
11 activities were a contributing source. Did you discuss
12 that with your physicians?

13 A No, not really.

14 MR. STERUP: I think that's all I have at this time. Thank
15 you.

16 EXAMINATION BY MR. WEBSTER:

17 Q Irma, my name's Mike Webster; and as I told your
18 sister, I represent Murphy Exploration in this matter. I
19 don't have very many questions. Can you tell me, have you
20 ever spoken with any of the Murphy Exploration people about
21 your water problems out there?

22 A No.

23 Q Do you know Ray Reede?

24 A No.

25 Q And I think that you were previously asked whether
26 you had spoken to the Indian Health Service people about
27 your water quality; and if I recall, your answer was no,
28

1 1990, is that right?

2 A Could have been, yeah. I'm not sure exactly when
3 this -- didn't remember the date.

4 Q So it could have been earlier than that?

5 A Might have been.

6 Q You said the well for your home is on the west
7 side of your house?

8 A Um-hm. Um-hm. (Indicates yes.)

9 Q And that it's a couple feet away from the wall?

10 A Yeah, from the trailer. Um-hm. (Indicates yes.)
11

12 Q Where is the septic system for -----

13 A On the west side.

14 Q It also is on the west side?

15 A Ah, well, no, the well is on the east side. I'm
16 sorry. I'm mistaken there. It was toward the east side,
17 I know is when the sun comes up, you see it good. The
18 septic tank was on the west side, and it was kind of on the
19 slope down, a little bit -- This was kind of like on a
20 little hill, and it was down the hill.

21 Q So you had the water well was on one side of your
22 home, and the septic system on the other side and the
23 septic system ran downhill?

24 A Yeah.

25 Q Did you ever have any problems with your septic
26 system out there?

27 A No. They would come and clean it out every so
28

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1 often, you know. It was all right.
 2 Q Did you ever have a water conditioner at your home
 3 out there?
 4 A Water conditioner. No, I don't think so. We had
 5 to start getting Culligan water for awhile.
 6 Q Was that bottled water? Is that ----
 7 A Um-hm. (Indicates yes.) He would come in and
 8 put it in, take the empties, you know.
 9 Q Do you remember when you started getting bottled
 10 water while you lived out there?
 11 A Oh, not the exact date, but it was after the
 12 doctor told me I shouldn't have salty stuff; and if the
 13 water was salty, I should have bottled water.
 14 Q Did the Culligan person, do you know, did they
 15 service more people out in that area than just you?
 16 A I don't know.
 17 Q You don't know whether they ----
 18 A I don't know because I would just -- you know,
 19 when I'd see that -- hear that noise coming, you know, I
 20 knew that was him.
 21 Q Do you remember about when you had -- and I
 22 believe this was asked, and I apologize for not writing it
 23 down. Do you remember when you had your congestive heart
 24 failure episode, about what year that was?
 25 A To the best I can remember, I think it was in the
 26 middle 80's, maybe -- I'm not exactly sure of the date.
 27 Q Sometime after that, though, then, until you moved
 28

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1 off the property in 1990, you were getting Culligan water
 2 delivered to your house for you to drink?
 3 A Um-hm. (Indicates yes.)
 4 Q Did you also use it then to cook with?
 5 A Sometimes.
 6 Q Do you recall what -- as I remember, you had
 7 indicated there were black particles or whatever in your
 8 tap water?
 9 A In my -- yeah. If I'd drink water with a glass,
 10 you know, and I'd drink it like that, well, when it got
 11 down, I could see some things on the bottom of the glass,
 12 you know. I'd go to the sink and go like that, you know,
 13 and try to see what it was, you know. Just specks.
 14 Q And was that then pretty regular? I mean, it
 15 wasn't -- did it happen every once in a while or did it
 16 happen nearly all the time when you got water?
 17 A After I started noticing it, it was regular; but
 18 who knows how long it was before I started noticing that.
 19 'Cause it tasted good at first, you know; and I never
 20 thought it was going to change.
 21 Q Why did you leave Albuquerque -- or excuse me, you
 22 said you left Albuquerque to go be with your son who was
 23 experiencing problems?
 24 A Yeah, um-hm.
 25 Q Why did you leave Santa Ana and come back to
 26 Poplar?
 27 A Well, at that time, he had a job, he was doing
 28

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1 good, but my granddaughter had just -- another reason we
 2 went to Santa Ana was because of their -- they had a ROTC
 3 program in the high school. My daughter's oldest child was
 4 in ROTC, and she wanted to continue for the last two years
 5 of her high school. So we called down there to find out if
 6 there really was, you know, something that she could go to.
 7 And then since it was, well, then we went down there; and
 8 she got to finish her last two years in high school in
 9 ROTC.
 10 Q And when that was all done and your son was kind
 11 of back on his feet and his life had turned around and
 12 things were squared away, then you got homesick or ----
 13 A No.
 14 Q --- you just decided to come back?
 15 A We decided to come back because we felt like our
 16 obligation there was done. My granddaughter Katerri joined
 17 the US Marine Corp right after graduation, and so we left
 18 the last day of June.
 19 Q Your leaving there then was really kind of a
 20 personal choice?
 21 A Yes.
 22 MR. WEBSTER: I don't think I have anything else.
 23 EXAMINATION BY MR. FAGAN:
 24 Q Hi, Irma, I'm Gerry Fagan.
 25 A Hi.
 26 Q I represent Marathon Oil. Have you ever talked
 27 with a Marathon Oil employee?
 28

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1 A No.
 2 Q How about a Texas Oil and Gas employee?
 3 A I don't think so.
 4 Q Have you ever been made aware of any facts that
 5 would make you think a Marathon oil well or Texas Oil and
 6 Gas well had caused any problems or failed?
 7 A Not that I know of.
 8 MR. FAGAN: Thanks. I have no further questions.
 9 EXAMINATION BY MR. ROSS:
 10 Q I'm John Ross. I represent Pioneer Natural
 11 Resources and Mesa Petroleum. Are you at all familiar with
 12 any of the operations of Mesa Petroleum in the East Poplar
 13 oil field?
 14 A No.
 15 MR. ROSS: Okay, thank you very much. I have no other
 16 questions. Thank you very much.
 17 (THERE BEING NO FURTHER QUESTIONS, THIS DEPOSITION WAS
 18 THEN CONCLUDED AT 2:05 P.M.)
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1 CERTIFICATE
 2 STATE OF MONTANA)
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1 CORRECTIONS TO DEPOSITION
 2
 3 The Deponent, IRMA REDDOOR, states she wishes to make the
 4 following changes in testimony as originally sworn:
 5 PAGE LINE SHOULD READ REASON
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1 DEPONENT'S CERTIFICATE
 2 I, IRMA REDDOOR, do hereby certify that I have read the
 3 foregoing transcript of my testimony and that the same is a
 4 full, true and correct record of my deposition except as to any
 5 corrections I have listed on the Corrections to Deposition form.
 6 _____ Changes and corrections made.
 7 _____ No changes or corrections made.
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 9 _____
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<p>-S-</p> <p>\$13,000 [1] 15:3</p> <p>\$388 [1] 14:1</p> <p>\$500 [1] 14:27</p> <p>-'-</p> <p>'81 [1] 5:13</p> <p>'82 [1] 7:23</p> <p>'93 [1] 7:20</p> <p>-1-</p> <p>1200 [1] 2:20</p> <p>12th [1] 4:2</p> <p>1900 [1] 2:12</p> <p>1935 [1] 4:25</p> <p>1966 [1] 28:3</p> <p>1980 [2] 5:13,18</p> <p>1980's [6] 6:16 10:22 15:4 16:21 29:12,26</p> <p>1981 [2] 5:18 7:14</p> <p>1982 [1] 19:11</p> <p>1983 [5] 7:19,21 19:9 23:21,22</p> <p>1985 [3] 10:3,3 23:22</p> <p>1987 [1] 7:8</p> <p>1989 [1] 31:27</p> <p>1990 [13] 7:13,16,24,26 9:3 12:13 19:16 22:11,18 23:15,23 32:1 34:1</p> <p>1995 [1] 12:13</p> <p>1997 [4] 4:21 13:10,23 13:24</p> <p>1:12 [2] 1:23 4:2</p> <p>-2-</p> <p>200 [2] 1:24 4:3</p> <p>2001 [4] 1:23 4:3 37:19 38:11</p> <p>201-1/2 [1] 4:19</p> <p>24th [1] 2:17</p> <p>2559 [1] 2:13</p> <p>27th [1] 37:19</p> <p>2:05 [1] 36:18</p> <p>-3-</p> <p>30 [1] 3:8</p> <p>315 [1] 2:17</p> <p>31st [2] 2:9,21</p> <p>35 [3] 2:4 3:9 8:23</p> <p>36 [1] 3:10</p> <p>37 [1] 3:11</p> <p>38 [1] 3:12</p> <p>39 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